

Re: S7-16-23

Dear Securities & Exchange Commissioners,

Please accept some initial comments on the Registered Index Linked Annuities proposal and related matters.

- Please publish a redline mark-up of the proposed disclosure form (Form N-4) against the current version. It is difficult to follow all of the changes.
- Please publish mock ups of a RILA registration form. The SEC has done this in the past for mutual fund summary prospecti, variable contract prospecti, the new fund reports, and the consumer relationship summary. It is more helpful to react to a mock up than to release or form text.
- Please produce a mobile friendly web-form for the feedback flier. This would be helpful. If funds and insurance companies are required to make disclosures ore web-accessible, the SEC should do the same.
- Use a period certain end date for comments. When the articles hit the press, it should be known when comments are due

These first 4 suggestions should be accomplished at the time of proposal so it is all available while the proposal is in the press cycle.

- The feedback flier should ask the same or similar questions to those asked in your investor testing survey. It should also do so making reference to a mock up that investors car react to.
- It appears the proposal was published 3 months after the statutory due date. It seems inappropriate for the SEC to have published non-required rules while those that are required are not completed in a timely fashion. I do not object to any specific rule that has come out recently. The SEC just needs to appropriately prioritize their work just like what you would expect from a company you regulate. If a company pout off complying with a statute to perform non-required work, you would sue them and rightfully so.
- I am a large proponent of e-delivery and because this product is so new (and does not have a large legacy book of business) it would be a good starting place to require e-delivery. However, one concern about all e-delivery is the sharp increase in email phishing schemes. I get many emails daily some from institutions I have no business with and others that I do. We cannot trust the emails we open. The historical advice of looking for typos is not enough. The SEC should take action, whether it is creating a secure communication portal or some sort of badge. Steps must be taken to keep money safe.
- I recommend a replacement for the EDGAR system. It is difficult to us. The documents are ugly, and it is hard to find filings (such as a RILA).

Thank you,

M. Mancinelli